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Federal Election Commission
Washington, DC 20463

MEMORANDUM

TO: Gregory R. Baker
Deputy General Counsel of Administration
Office of General Counsel

FROM: Lynn M. Fraser *[Signature]*
Director, ADR Office

CC: Patricia C. Orrock
Chief Compliance Officer (w/o documents)

Jeff Jordan, Docket Leader
Complaints Examination & Legal Administration (w/o documents)

Daniel A. Petalas
Associate General Counsel for Enforcement

Kathleen Guith
Deputy Associate General Counsel for Enforcement

Deborah Chacona
Assistant Staff Director, Reports Analysis Division (w/o documents)

SUBJECT: ADR 718 (RAD 14L-14) **R**
Afghanistan & Iraq Veterans for Congress PAC and Scott B. Mackenzie,
Treasurer

DATE: September 30, 2014

Pursuant to Commission procedures to refer a matter to the Office of General Counsel if the Committee does not elect to participate in the ADR process, enclosed please find the referral of the Afghanistan & Iraq Veterans for Congress PAC and Scott B. Mackenzie, Treasurer (Respondents or the Committee). The ADR Office refers this matter to the Office of General Counsel for appropriate enforcement action.

The Reports Analysis Division (RAD) referred Respondents for failing to disclose all activity on their 2012 30 Day Post-General Report. Respondents filed their original 2012 30 Day Post-General Report on December 6, 2012. On July 9, 2013, the Committee filed

an Amended 2012 30 Day Post-General Report that disclosed additional receipts of \$109,566.25 and additional disbursements totaling \$132,979.21.

The ADR Office records now reflect ADR 718 (RAD 14L-14) as closed.

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: May 15, 2014

ANALYST: David Butler

- I. COMMITTEE: Afghanistan & Iraq Veterans for Congress
PAC
C00459412
Scott B. Mackenzie, Treasurer
(02/06/14 - Present)
Chris Covucci, Treasurer
(02/25/09 - 02/05/14)
2776 S. Arlington Mill Dr. #806
Arlington, VA 22206
- II. RELEVANT STATUTE: 2 U.S.C. § 434(b)(2) and (4)
11 CFR § 104.3(a) and (b)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Afghanistan & Iraq Veterans for Congress PAC ("the Committee") amended its 2012 30 Day Post-General Report to disclose additional receipts totaling \$109,566.25 and additional disbursements totaling \$132,979.21 that were not disclosed in the original report (Attachment 2).

On December 6, 2012, the Committee filed the original 2012 30 Day Post-General Report covering the period from October 18, 2012 through November 26, 2012. The report disclosed \$0.00 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals) and \$0.00 in receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals). The report also disclosed \$0.00 in disbursements on Line 21(b) (Other Federal Operating Expenditures) and \$25,000.00 in disbursements on Line 23 (Contributions to Federal Candidates) of the Detailed Summary Page (Images 12962896358-59).

On July 9, 2013, the Committee filed an Amended 2012 30 Day Post-General Report. The report disclosed \$21,132.00 in receipts on Line 11(a)(i) and \$88,434.25 in receipts on Line 11(a)(ii) of the Detailed Summary Page, a total increase in receipts of \$109,566.25 from the original report. The report also disclosed \$125,979.21 in ~~disbursements on Line 21(b) and \$32,000.00 in disbursements on Line 23 of the Detailed~~ Summary Page, a total increase in disbursements of \$132,979.21 from the original report (Images 13964009660-61, Attachment 2).

On October 29, 2013², a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2012 30 Day Post-General Report, received July 9, 2013. The RFAI requested clarification regarding the additional receipts and disbursements disclosed on the Amended 2012 30 Day Post-General Report that were not disclosed on the original filing (Images 13330038986-87).

On November 18, 2013, the Reports Analysis Division (RAD) Analyst left a voice mail message for Kieran Lalor, a representative for the Committee, stating that the Analyst was trying to reach Christopher Covucci, the Committee Treasurer, regarding the RFAI referencing the increased activity disclosed on the Amended 2012 30 Day Post-General Report, received July 9, 2013. The Analyst stated that this matter could be forwarded to another office for further Commission action and asked that his call be returned (Attachment 3).

On the same day, Mr. Lalor returned the RAD Analyst's call. The Analyst told Mr. Lalor how to obtain a copy of the RFAI involving increased activity disclosed on the Amended 2012 30 Day Post-General Report, received July 9, 2013. The Analyst said that this issue could be referred for further action to the Commission and if the Committee wanted to provide further clarification of this issue, they should submit the clarification for the public record by December 3, 2013 (Attachment 3).

To date, no further communication has been received from the Committee regarding this matter.

² Please note the RFAI was originally sent to the Committee on September 19, 2013. However, the RFAI was removed from the public record and resent to the Committee on October 29, 2013 due to the government shutdown that occurred in October 2013.

O-Index (2013-2014)															
		Cmte. ID: C00459412		Cmte. Name: AFGHANISTAN & IRAQ VETERANS FOR CONGRESS PAC											
		Treasurer Name: IMACKENZIE, SCOTT B		Address: 2776 S ARLINGTON MILL DR #806, ARLINGTON, VA 22206											
		Cmte. Type: Q (QUALIFIED NON-PARTY)		Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER											
Form Tp	Rpt Tp	All	Recpt Dt	Pgs	Begin Lng#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debits & Loans
MS-T			2/6/2014	6	14031181930				-	-	-	-	-	-	-
MS-N			2/6/2014	1	13330047708				-	-	-	-	-	-	-
RQ2	MY	N	1/18/2013	3	13330040388	1/1/2013	6/30/2013	1/18/2013	-	-	-	-	-	-	-
RQ2	YES	A	4/30/2013	2	13330043932	7/1/2013	12/31/2013	4/30/2013	-	-	-	-	-	-	-
RQ2	TER	T	5/9/2014	2	14330051782	1/1/2014	3/31/2014	5/9/2014	-	-	-	-	-	-	-
F3XN	MY	N	7/31/2013	210	13944303194	7/1/2013	6/30/2013		\$2,979	\$317,669	\$315,032	\$5,617	\$116,059		\$116,059
F3XA	MY	A	12/16/2013	134	13944064364	1/1/2013	6/30/2013		\$2,979	\$317,669	\$315,032	\$5,617	\$116,059		\$116,059
F3XN	YES	N	7/31/2013	228	13944031809	7/1/2013	6/30/2013		\$5,617	\$116,059	\$113,495	\$2,439	\$0		\$0
F3XA	YE	A	4/5/2014	42	14960607998	7/1/2013	12/31/2013		\$5,617	\$157,772	\$163,389	\$0	\$0		\$0
F3XN	YES	N	4/5/2014	15	14960608040	7/1/2013	6/30/2014		\$0	\$0	\$0	\$0	\$0		\$0
F3XA	YES	A	4/5/2014	4	14960607994	7/1/2013	6/30/2014		\$0	\$0	\$0	\$0	\$0		\$0
Total										\$478,443	\$478,443				

O-Index (2011-2012)																												
Cmte. ID: C00459412 Cmte. Name: AFGHANISTAN & IRAQ VETERANS FOR CONGRESS PAC																												
Treasurer Name: MACKENZIE, SCOTT B Address: 2776 S ARLINGTON MILL DR #808, ARLINGTON, VA 22206																												
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER																												
Form	Ip	Rpt	Ip	Alt	Recpt	Dt	Pgs	Begin	Img#	Beg	Cvg	Dt	End	Cvg	Dt	Ltr	Mail	Dt	Begin	Cash	Recpts	Disb	End	Cash	Debts	Loans	Debts	Loans
MS-M					4/18/2011		1	11930806957																				
MS-O					4/18/2011		1	11930806957																				
MS-T					10/3/2011		1	11931546508																				
RQ7	M3	N			4/5/2011		2	11030590244		2/1/2011		2/28/2011																
RQ2	O2	N			9/2/2011		2	11300332811		2/2/2011		2/28/2011																
RQ2	O2	N			8/31/2011		3	11330013167		4/1/2011		6/30/2011																
RQ2	O2	N			12/16/2012		2	12030743055		7/1/2011		12/31/2011																
RQ2	YE	N			11/16/2012		2	12330016303		7/1/2011		12/31/2011																
RQ2	O2	N			5/3/2013		2	12030802945		1/1/2012		3/31/2012																
RQ2	O1	N			11/16/2012		2	12330016305		1/1/2012		3/31/2012																
RQ2	O2	N			5/3/2013		2	12330016305		1/1/2012		3/31/2012																
RQ2	O2	N			5/3/2013		2	13330030597		7/1/2012		9/30/2012																
RQ2	O2	N			5/3/2013		2	13330030599		10/1/2012		10/1/2012																
RQ7	30G	N			12/14/2012		2	12030984736		10/1/2012		10/17/2012																
RQ2	O2	N			5/3/2013		2	13330030604		10/1/2012		12/5/2012																
RQ2	30G	A			9/19/2013		2	13330039986		10/18/2012		11/26/2012																
F3XN	M2	N			3/2/2011		8	11930427957		1/1/2011		1/31/2011																
F3XN	M3	N			7/2/2010		10	11932400832		2/1/2011		2/28/2011																
F3XN	M4	N			7/29/2011		17	11932130860		3/1/2011		3/31/2011																
F3XN	O2	N			5/3/2013		2	11932400832		4/1/2011		6/30/2011																
F3XN	YE	N			5/9/2012		57	12951655287		7/1/2011		12/31/2011																

O-Index (2009-2010)															
Cmte. ID: C00459412 Cmte. Name: AFGHANISTAN & IRAQ VETERANS FOR CONGRESS PAC															
Treasurer Name: WACKENZIE, SCOTT B Address: 2776 S ARLINGTON MILL DR #806, ARLINGTON, VA 22206															
Cmte. Type: Q (QUALIFIED NON-PARTY) Cmte. Designation: U (UNAUTHORIZED) Filing Frequency: QUARTERLY FILER															
Form To	Rpt To	All	Rept Dt	Pgs	Begin Inq#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Repts	Disb	End Cash	Debits	Loans	Debits & Loans
MS-T			1/1/2010	2	10030210082				-		-	-	-	-	-
MS-N			1/1/2010	2	10030210082				-		-	-	-	-	-
MS-M			6/16/2010	1	10990769231				-		-	-	-	-	-
MS-O			6/29/2010	1	10990769232				-		-	-	-	-	-
MS-T			6/29/2010	1	10330001209				-		-	-	-	-	-
MS-T			10/21/2010	1	10991768254				-		-	-	-	-	-
MS-T			12/21/2010	1	10992499892				-		-	-	-	-	-
MS-T			5/21/2010	2	10030334137			5/21/2010	-		-	-	-	-	-
MS-T			5/19/2010	3	10030333311		1/1/2010	3/31/2010	-		-	-	-	-	-
MS-T			9/10/2010	3	10030472559		1/1/2010	6/30/2010	-		-	-	-	-	-
MS-T			9/29/2010	3	10030431075		7/1/2010	7/31/2010	-		-	-	-	-	-
MS-T			11/2/2010	4	11030540222		9/1/2010	9/30/2010	-		-	-	-	-	-
MS-T			11/2/2011	4	11030540222		9/1/2010	9/30/2010	-		-	-	-	-	-
F3XN	MY	N	7/31/2009	20	29992560133		1/1/2009	6/30/2009	\$0	\$2,653	\$40,632	\$12,021	-	-	\$0
F3XN	VE	N	7/31/2009	20	10990238242		7/1/2009	2/3/2009	\$12,021	\$29,969	\$108,974	\$23,959	-	-	\$0
F3XN	Q1	N	4/15/2010	36	10990544464		1/1/2010	3/31/2010	\$23,119	\$112,078	\$107,995	\$27,602	-	-	\$0
F3XN	Q1	N	4/15/2010	36	10990225043		1/1/2010	3/31/2010	\$23,119	\$112,078	\$107,995	\$27,602	-	-	\$0
F3XN	Q1	A	6/16/2010	36	10990769168		1/1/2010	3/31/2010	\$23,119	\$112,078	\$107,995	\$27,602	-	-	\$0
F3XN	M7	N	10/15/2010	51	10991131965		4/1/2010	6/30/2010	\$27,602	\$112,078	\$107,995	\$27,602	-	-	\$0
F3XN	M7	A	10/15/2010	51	10931483167		4/1/2010	6/30/2010	\$27,602	\$112,078	\$107,995	\$27,602	-	-	\$0
F3XN	MA	N	7/31/2010	25	10990769168		7/1/2010	6/30/2010	\$27,602	\$112,078	\$107,995	\$27,602	-	-	\$0

Page 3 of 3
Attachment 1

Afghanistan & Iraq Veterans for Congress PAC (C00459412)

Additional Receipts by Line Number

2012 30 Day Post-General Report/Amended 2012 30 Day Post-General Report

Report Line	2012 30 Day Post-General Report (Image 12962896358)	Amended 2012 30 Day Post-General Report, received 7/9/13 (Image 13964009660)	Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$0.00	\$21,132.00	\$21,132.00
Line 11(a)(ii): Unitemized Contributions from Individuals	\$0.00	\$88,434.25	\$88,434.25
Total Variance			\$109,566.25

Additional Disbursements by Line Number

2012 30 Day Post-General Report/Amended 2012 30 Day Post-General Report

Report Line	2012 30 Day Post-General Report (Image 12962896359)	Amended 2012 30 Day Post-General Report, received 7/9/13 (Image 13964009661)	Variance Amount
Line 21(b): Other Federal Operating Expenditures	\$0.00	\$125,979.21	\$125,979.21
Line 23: Contributions to Federal Candidates	\$25,000.00	\$32,000.00	\$7,000.00
Total Variance			\$132,979.21